

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES

v.

MOHAMED HAMADE

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Cr. No. 04-10214-GAO

GOVERNMENT’S AMENDED SUMMARY OF EXPERT TESTIMONY

Pursuant to Fed. R. Crim. P. 16(a)(1)(G), the government hereby discloses a written summary of the testimony of Dimitrios Ioannidis (“Ioannidis”), the Counsel to the Greek Consulate in Boston, who will testify at trial. Ioannidis will describe the process involved in getting married in Greece and recording the marriage with authorities. Specifically, Ioannidis will testify that in order to be married civilly in Greece a number of steps are required, including:

- (1) the parties must file an application for a license to be married in the municipality of their residence;
- (2) attached to the application are affidavits from both parties certifying that they are not presently married;
- (3) also attached to the application is identification from the foreign party to the marriage;
- (4) the parties are required to notice their intention to marry in the local newspaper;
- (5) the municipality may issue a license to each party one week subsequent to the date of application to ensure that there are no third party denunciations or the existence of any other hindrance to the marriage;
- (6) the parties must then apply to solemnize the marriage and attach the marriage licenses;
- (7) the marriage ceremony is performed with adult witnesses in attendance;
- (8) a marriage certificate is produced by the person who performs the ceremony and it is signed by the parties and the witnesses;
- (9) within 40 days of the ceremony, the marriage must be registered with the municipality; and
- (10) finally, the family unit must be registered with the municipality.

The basis for his testimony will be his familiarity with the Greek legal system through his more than 15 years experience working as Counsel to the Greek Consulate. Since 1992, Ioannidis has fielded all inquiries to the Greek Consulate in Boston from individuals, businesses and educational and non-profit institutions regarding questions of Greek law. His testimony will also be based on his work doing different and various investigations in Greece.

In addition, Ioannidis' testimony will also be based on his review of the Civil Code of Greece, particularly Section 391/1982 that describes the process of getting married in Greece through a civil ceremony. Ioannidis often advises United States citizens that may want to immigrate back to Greece on how they can register their marriages in the United States in Greece. This is significant because without the registration, the United States citizen can not create a registered family unit, as required by Greek law, obtain a Greek passport, obtain a Greek tax identification and be able to work and stay in Greece and throughout the European Union member countries indefinitely. Ioannidis has represented individuals in registering their United States marriages in Greece that have facilitated the process for them. Ioannidis has also personally registered his own marriage and his family unit. Furthermore, he is also familiar with the Greek registration of birth records, marriage records and the establishment of family units through the many cases he has been involved throughout the years.

Ioannidis is a native of Greece and fluent in the language.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Kimberly P. West
KIMBERLY P. WEST
ALOE S. CHAKRAVARTY
Assistant U.S. Attorneys

Dated: May 11, 2007

CERTIFICATE OF SERVICE

I hereby certify that these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Kimberly P. West
Kimberly P. West
Assistant U.S. Attorney